UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

| IN RE: FACEBOOK, INC. CONSUMER |
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| PRIVACY USER PROFILE LITIGATION. |

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO FILE
OPPOSITION TO PLAINTIFFS' MOTION
FOR LEAVE TO FILE SECOND
AMENDED CONSOLIDATED
COMPLAINT

Pursuant to Local Rule 6-2(a), the parties stipulate and agree as follows:

- 1. On April 14, 2020, Plaintiffs filed a motion for leave to file a Second Amended Consolidated Complaint.
- 2. Defendant Facebook, Inc.'s opposition to that motion was due on April 28, 2020, pursuant to Local Rule 7-3(a).
- 3. In view of Magistrate Judge Corley's April 17, 2020 Order directing the parties to focus their resources between April 17 and May 1 on four specific discovery issues, Facebook sought to extend Facebook's deadline to respond until May 12, and Plaintiffs agreed to honor that request. (*See* Dkt. 408.)
- 4. Facebook now requires additional time to prepare its opposition, particularly in view of Magistrate Judge Corley's May 1, 2020 Order, directing the parties to complete their custodian negotiations between May 1 and May 14.
- 5. On May 8, 2020, counsel for Facebook contacted Co-Lead Counsel for Plaintiffs to ask for consent to a second extension of time to respond to Plaintiffs' motion.
- 6. The parties have agreed to a seven-day additional extension of Facebook's deadline to file an opposition to Plaintiffs' motion for leave to file a Second Amended Consolidated Complaint and a seven-day additional extension for Plaintiffs to file a reply thereto. The parties accordingly stipulate that Facebook's opposition shall be filed on or before May 19, 2020 and that Plaintiffs' reply in support of the motion for leave to file a Second Amended Consolidated Complaint is due June 2, 2020.
- 7. The parties stipulate to continue the hearing on the motion, which Plaintiffs noticed for May 21, 2020 at 10 a.m., to June 18, 2020 at 10 a.m., or such other date that is convenient for the Court.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: May 12, 2020

KELLER ROHRBACK LLP

By: <u>/s Derek W. Loeser</u> Derek W. Loeser

Derek W. Loeser (admitted *pro hac vice*) Lynn Lincoln Sarko (admitted *pro hac vice*) Gretchen Freeman Cappio (admitted *pro hac vice*)

Cari Campen Laufenberg (admitted *pro hac vice*)

David J. Ko (admitted *pro hac vice*) Benjamin Gould (SBN 250630) Adele Daniel (admitted *pro hac vice*) 1201 Third Avenue, Suite 3200 Seattle, WA 98101

Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com
lsarko@kellerrohrback.com
gcappio@kellerrohrback.com
claufenberg@kellerrohrback.com
dko@kellerrohrback.com
bgould@kellerrohrback.com
adaniel@kellerrohrback.com

Christopher Springer (SBN 291180) 801 Garden Street, Suite 301 Santa Barbara, CA 93101 Tel.: (805) 456-1496 Fax: (805) 456-1497 cspringer@kellerrohrback.com

Co-Lead Counsel for Plaintiffs

Respectfully submitted,

BLEICHMAR FONTI & AULD LLP

By: <u>/s Lesley E. Weaver</u> Lesley E. Weaver

Lesley E. Weaver (SBN 191305)
Anne K. Davis (SBN 267909)
Joshua D. Samra (SBN 313050)
Matthew P. Montgomery (SBN 180196)
Angelica M. Ornelas (SBN 285929)
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com
adavis@bfalaw.com

mmontgomery@bfalaw.com aornelas@bfalaw.com

isamra@bfalaw.com

DATED: May 12, 2020

Respectfully submitted,

GIBSON, DUNN & CRUTCHER, LLP

Deborah Stein (SBN 224570) dstein@gibsondunn.com 333 South Grand Avenue Los Angeles, CA 90071-3197 Telephone: 213.229.7000

Facsimile: 213.229.7520

Kristin A. Linsley (SBN 154148) klinsley@gibsondunn.com

Martie Kutscher (SBN 302650) mkutscherclark@gibsondunn.com GIBSON, DUNN & CRUTCHER LLP 555 Mission Street, Suite 3000 San Francisco, CA 94105-0921 Telephone: 415.393.8200 Facsimile: 415.393.8306

By: /s/ Orin Snyder Orin Snyder (pro hac vice) osnyder@gibsondunn.com GIBSON, DUNN & CRUTCHER LLP 200 Park Avenue New York, NY 10166-0193

Telephone: 212.351.4000 Facsimile: 212.351.4035

Joshua S. Lipshutz (SBN 242557) jlipshutz@gibsondunn.com GIBSON, DUNN & CRUTCHER LLP 1050 Connecticut Avenue, N.W. Washington, DC 20036-5306 Telephone: 202.955.8500 Facsimile: 202.467.0539

Attorneys for Defendant Facebook, Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

| DATE: | |
|-------|---|
| | |
| | United States District Judge Vince Chhabria |

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained.

DATED: May 12, 2020 By: /s/ Orin Snyder

Orin Snyder

CERTIFICATE OF SERVICE

I, Orin Snyder, hereby certify that on May 12, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

By: <u>/s/ Orin Snyder</u> Orin Snyder